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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**
13

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 vs.
17 MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,
18 Defendants.
19

CASE NO. 3:18-cr-00577-CRB

**Defendants' Joint Motion for Order
Allowing Defendants' Counsel to
Bring Equipment to Trial and
Clarifying Lynch Security
Requirements for Trial**

Judge: Hon. Charles R. Breyer

Court: Courtroom 6 – 17th Floor

Trial Date: March 18, 2024

1 Counsel for Defendants Michael Lynch and Stephen Chamberlain anticipate
2 requiring the use of the following equipment at trial, which is set to commence on
3 March 18, 2024.

- 4 1) Several boxes of binders;
- 5 2) Several boxes of paper/office supplies;
- 6 3) Small laserjet printer and associated power and HDMI cords;
- 7 4) Collapsible handcarts to move boxes;
- 8 5) Boxes of snacks/hand sanitizer/Lysol wipes;
- 9 6) Large video screen; and
- 10 7) Additional a/v equipment for the trial tech supporting the defense.

11 Counsel's staff contacted the Courtroom Deputy and was told, in order to
12 bring equipment into the building, an order from the Court was required.
13 Accordingly, Defendants respectfully request that the Court issue the proposed order
14 allowing counsel's staff to bring these items into the courthouse for trial.

15 Additionally, Counsel for Defendant Lynch respectfully requests that the
16 Court clarify Defendant Lynch's release conditions to provide that his security detail
17 need not be armed within the courthouse. Instead, inside and in the immediate
18 vicinity of the courthouse, Defendant Lynch will be guarded by an unarmed security
19 guard from the security firm.

1 DATED: March 13, 2024

Michael Landman
Bird, Marella, Rhow, Lincenberg,
Drooks & Nessim, LLP

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5 By: /s/ Michael C. Landman
6 Michael C. Landman
7 Attorney for Defendant Stephen Keith
8 Chamberlain

9 DATED: March 13, 2024

Jonathan Matthew Baum
STEPTOE LLP

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13 By: /s/ Jonathan Matthew Baum
14 Jonathan Matthew Baum
15 Attorney for Defendant Michael Richard
16 Lynch
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